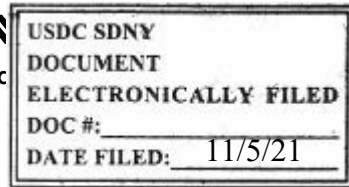




Garson, Segal, Steinmetz, Fladgate



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Robert Garson ◊

Michael Steinmetz * ∞ □

Chris Fladgate °

Thomas Segal ^

Stephen Greenwald

John Lane ∞

Timothy Kendal ◊

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Kevin Kehrli <

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Email: kk@gs2law.com

November 4, 2021

Via ECF

Hon. Alison J. Nathan
United States Courthouse
40 Foley Sq., Courtroom 906
New York, New York 10007

Re: LG Capital Funding, LLC v. Hangover Joe's Holdings Corp. (21-cv-5584(AJN)):
Adjournment Request

To the Hon. Alison J. Nathan:

This firm represents LG Capital Funding, LLC ("Plaintiff"), plaintiff in the above-captioned. I write in anticipation of the Initial Conference, presently scheduled for November 12, 2021, and to respectfully request an adjournment thereof for the reason below.

This matter was commenced by Summons and Complaint on June 28, 2021. Following issues serving Defendant, Plaintiff served Defendant's Registered Agent on September 23, 2021, making Defendant's response to the Complaint due on or before October 14, 2021.

Because Defendant's time to respond would not have passed at the time of the conference scheduled for October 8, 2021, Plaintiff requested that the conference be adjourned, which the Court graciously granted.

Defendant has not responded to the Complaint; nor has Defendant contacted Plaintiff or its counsel regarding this matter. Accordingly, Plaintiff intends to seek a Clerk's Certificate of

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Continuation Page

Default and move for default judgment thereafter pursuant to Your Honor's Rule 3.L. Plaintiff, therefore, respectfully requests that the Court adjourn the conference scheduled for November 12, 2021 *sine die*. SO ORDERED.

Pursuant to Your Honor's Individual Rule 1.E.: (i) the Initial Conference is presently scheduled for November 12, 2021; (ii) there has been one previous request for an adjournment and (iii) it was granted; and (iv), as Defendant has not appeared in the matter, Plaintiff was not able to obtain consent.

Respectfully Submitted,

/s/ Kevin Kehrli
Kevin Kehrli, Esq.

